REMARKS

In the Office Action, the Examiner issued a final rejection of Claims 1-16, which is all of the pending claims over the prior art, primarily. Claims 1, 2, 5-7, 10-12 and 15 were rejected under 35 U.S.C. 102 as being fully anticipated by U.S. Patent 6,687,873 (Ballantyne, et al.); and Claims 3, 4, 8, 9, 13 and 14 were rejected under 35 U.S.C. 103 as being unpatentable over Ballantyne, et al. in view of U.S. Patent 6,292,932 (Baisley, et al.).

The Examiner did not specifically discuss the rejection of Claim 16, and Applicants respectfully request that the Examiner indicate more specifically the basis for that rejection and the specific art relied on to reject Claim 16.

Also, Applicant herein asks that independent Claims 1, 6 and 11 be amended to better define the subject matters of these claims.

For the reasons discussed below, Claims 1-16 patentably distinguish over the prior art and are allowable. The Examiner is thus asked to enter this Amendment, to reconsider and to withdraw the rejections of Claims 1-16, and to allow these claims.

As explained in detail in the present application, this invention relates to methods and systems for converting data files to a specified format, such as an XML format. While there is a significant need to convert legacy data to an XML format, there currently is no widely applicable, generalized and automated procedure to do this.

The instant invention addresses this need by providing a parser that can be used on its own or as part of a larger system to convert large amounts of data quickly to an XML formal. This is done by use of a unique map file having a given set of tags and attributes, by forming a tree structure from this map file, and then using that tress structure to form an XML file.

To elaborate, to convert a flat file having legacy data, a map file is defined having tags and attributes. Also, each column heading of the flat file is included in the reference for one of these attributes. A tree structure, having a plurality of nodes, is formed from the map file. All of the nodes of the tree structure are then traversed, node-by-node; and at each node, an attribute of the node is entered into the XML file. Also, each time a reference of one of the attributes matches a column heading of the legacy file, data from that column are entered into the XML file. In this way, all of the legacy data is entered into the XML file, yet the format of that file is controlled in a desired manner through use of the attributes of the map file.

Ballantyne, et al. relates to reporting XML data from a legacy computer system, however, Ballentyne, et al. does this in a way that is completely different from the present invention. With the Ballantyne, et al. procedure, the legacy computer application is modified so that this application outputs data in the desired way. This feature of the Ballantyne, et al. process is perhaps best articulated in the summary of the Invention given in Ballantyne, et al. There, in column 2, lines 62-67, Ballantyne, et al. states that the invention "provides XML output by modifying the underling legacy computer system program applications to report data in XML format instead of transforming the output from the legacy computer system after the data is reported in the format of the legacy computer system." Thus, the approach taken by Ballantyne, et al is the opposite of the approach taken by the present invention. Consequently, Ballantyne, et al. actually teaches away from the instant invention.

In this regard, it is noted that Ballantyne, et al. discloses in Figure 4 text that is in a flat file, and Figure 5 of Ballantyne, et al. shows this text in an XML format. Ballantyne, et al, however, does not convert the text of Figure 4 to the text of Figure 5. Rather, as discussed in Ballantyne, et al. from column 8, line 46 to column 9, line 64, Figures 4 and 5 represent two

different printed outputs of the same basic data. Figure 4 shows a printed output from a COBOL program, and Figure 5 shows a printed output from the modified program shown in Figure 5A. Ballantyne, et al. does not convert the <u>text</u> of Figure 4 to the text of Figure 5, but rather converts the <u>legacy application</u> so that this legacy application outputs data in the format of Figure 5.

Another important difference between this invention and the procedure disclosed in Ballantyne, et al. relates to the purpose for which, and the way in which, the mapping file is used. With the procedure described in Ballantyne, et al, a mapping engine is used to map a model of write applications of the legacy computer system to an XML schema (see column 3, lines 15-19, for example). In the instant invention, the mapping file is used to map text in one format to text in another format. Moreover, the mapping procedure of this invention involves traversing a node tree. Ballantyne, et al. shows a node tree in Figure 7A, and this tree is used to help output date, but the tree is not used to convert data from a flat file. In contrast, the node tree of the present invention is used to convert such data.

Independent Claims 1, 6 and 11 describe important differences between the present invention and Ballantyne, et al. For example, the preamble of each of these claims indicates that the claim is directed to converting <u>text</u> in a delimited flat file <u>to text</u> in a markup language specified by a document type definition file. This is not what Ballantyne, et al. does; rather, that reference teaches modifying the legacy computer program.

In addition, Applicants herein ask that each of Claims 1, 6 and 11 be amended to describe more positively differences between the claim and Ballantyne, et al. For instance, as presented herewith, these claims indicate that each of the column headings of the flat file is included in the attributes of the mapping file. Also, these claims are being amended to

indicate that when the nodes of the mapping tree are traversed and one of the references of the attributes of a node matches one of the column headings, text from the column having that matching column heading, is retrieved and entered into the markup language file.

The other references of record have been reviewed, and these other references, whether considered individually or in combination, also do not disclose or suggest these features of the present invention.

For example, Baisley, et al. discloses a procedure for converting one language model to another language model. This reference was cited primarily for its disclosure of a default naming procedure, and Baisley, et al. does not disclose or teach, among other features, the map file of, or the way this map file is used in, the present invention.

In view of the above-discussed differences between Claims 1, 6 and 11 and the prior art, and because of the advantages associated with those differences, Claims 1, 6 and 11 patentably distinguish over the prior art and are allowable. Claims 2-5 and 16 are dependent from and are allowable with Claim 1. Similarly, Claims 7-10 are dependent from, and are allowable with, Claim 6; and Claims 12-15 are dependent from Claim 11 and are allowable therewith.

The changes requested herein to Claims 1, 6 and 11 only elaborate on features already described in the claims. For example, these claims presently describe the columns and the column headings, and Claims 1, 6 and 11 are being amended to indicate more expressly how those column headings are used in the mapping file to cause text to be mapped from the flat file to the markup language file. It is thus believed that entry of this Amendment is appropriate, and such entry is respectfully requested.

In light of the above-discussion, the Examiner is respectfully requested to enter this Amendment. The Examiner is also asked to reconsider and to withdraw the rejection of Claims 1, 2, 5-7, 10-12 under 35 U.S.C. 102, the rejection of Claims 3, 4, 8, 9, 13 and 14 under 35 U.S.C. 103, and the rejection of Claim 16, and to allow Claims 1-16. If the Examiner believes that a telephone conference with Applicants' Attorneys would be advantageous to the disposition of this case, the Examiner is asked to telephone the undersigned.

Respectfully submitted,

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